

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS**

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Peter Harris and Loni Harris,	:	Case No. 1:24-cv-00313-MJT
Plaintiff(s),	:	
v.	:	Request for International
	:	Judicial Assistance
Upwintrade.com, <i>et al.</i> ,	:	(Letter Rogatory)
Defendant(s).	:	

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To the Appropriate Judicial Authority of the Republic of Singapore

The United States District Court for the Eastern District of Texas, Beaumont Division (the “Court”) presents its compliments to the appropriate judicial authority of the Republic of Singapore (“Singapore”), and requests international judicial assistance to obtain evidence to be used in a civil proceeding before this court in the above-captioned matter.

Peter Harris and Loni Harris are the plaintiffs in this matter (hereafter, the “Plaintiffs”). They have requested that the Court issue this letter rogatory pursuant to the Hague Evidence Convention. Having determined that Plaintiffs request was justified and permissible, the Court now requests the assistance described herein as necessary in the interests of justice. Specifically, the Court requests that the judicial authority of Singapore compel appropriate control persons associated with the below-named entities to produce documents as further described herein.

Bybit Fintech Limited
40A Orchard Road, Macdonald House
Suite 03-01
Singapore, 238838

I. FACTS

As Attachment 1 to this letter, the Court has attached a true and correct copy of Plaintiffs’ First Amended Complaint in the above-captioned matter. This document contains a detailed statement of the allegations giving rise to the claims at issue in this matter.

In sum, in this case, Plaintiffs allege that they were the victims of type of cryptocurrency-related fraud known as a “pig butchering scam.” They allege that the Defendants stole more than \$650,000.00 of their savings by convincing them to utilize an online platform calling itself “Upwintrade” to engage in investment and trading. But in the end, Plaintiffs allege, this platform was simply a scam designed to steal their assets.

As relevant to the instant request for production of evidence, Plaintiffs have engaged a blockchain expert to “trace” the assets allegedly stolen from them through the blockchain to their ultimate destinations. This tracing led Plaintiffs, in part, to blockchain addresses associated with Bybit Fintech Limited, which operates under the name Bybit (“Bybit”). Bybit is an “exchange” that engages in cryptocurrency-related operations, such as by allowing users to make accounts to which they can transfer cryptocurrency assets. Plaintiffs have presented evidence tending to show that the Defendants used accounts at Bybit to receive the assets allegedly stolen from them. Plaintiffs therefore seek to discover the documents listed below from Bybit, to further establish the identities of the Defendants and their co-conspirators and ascertain the present locations of the assets allegedly stolen from them.

The specific blockchain “deposit addresses” to which Plaintiffs allege their assets were transferred are as follows:

- 1HyTkypyP8yoRGSRrvr74SyEhhX1bkLMiQ
- 14rxMsRQV5fkTDb3ShorD91xQvdwp34hjb

In the description of the instant evidence requests set out below, the Court will refer to these addresses collectively as the “Deposit Addresses.”

II. EVIDENCE REQUESTS

Plaintiffs have requested that Revolut produce the following categories of documents.

- All “know your customer” records associated with the Deposit Addresses, including documents sufficient to show all account owners’ identification documents, biographical information, or contact information.
- All transaction records associated with the Deposit Addresses, including documents sufficient to show all incoming and outgoing transactions associated with the Deposit Addresses and the account(s) to which the assets that passed through the Deposit Addresses were ultimately transferred.
- All “IP Logs” showing the locations and/or devices from which the account owners associated with the Deposit Addresses accessed their Revolut account(s).

The Court finds that these evidence requests are reasonable under the circumstances and requests that your government compel the electronic production of these materials to Plaintiffs’ counsel, whose contact information is listed below.

III. PROTECTIVE ORDER

Recognizing that the requested evidence will contain sensitive information, Plaintiffs voluntarily requested the entry of an appropriate confidentiality order in this case. The Court subsequently entered that order. I have attached a true and correct copy of this confidentiality order hereto as Attachment 2.

IV. RECIPROCITY

In the furtherance of justice and by the proper and usual process of this court, the Court assures the judicial authorities of Singapore that it is willing to provide similar cooperation and assistance to the judicial authorities of Singapore in the event that Singapore requests similar assistance.

V. REIMBURSEMENT FOR COSTS

Plaintiffs are willing to reimburse the judicial authority of Singapore for its costs incurred in the execution of this Court's Letter Rogatory, up to five hundred U.S. Dollars. Plaintiffs request to be contacted if the amount to execute this Letter Rogatory will exceed that amount.

VI. SUBMITTING PARTY

The contact information for Plaintiffs' counsel is as follows. The Court requests that your authority communicate directly with Plaintiffs' counsel concerning any logistical or procedural issues required to be addressed as part of the evidence-production process.

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VII. CONCLUSION

The Court appreciates your time and attention. Should your office have any questions concerning this letter or the matters implicated herein, you are invited to contact my chambers.

Dated: [DATE]

Hon. Michael J. Truncale
United States District Judge
United States District Court for the Eastern District of Texas

[SEAL OF COURT]